



ADMINISTRATIVE POLICY

SUBJECT	SOCIAL MEDIA POLICY		
NUMBER	23-01	SIGNED DATE	12/5/2022
ISSUED BY	Mark Washington, City Manager <i>Mark A. Washington</i>		
PREPARED BY	Communications Department		
REVISED	NA		
ASSOCIATED POLICIES			
CITY VALUES	<input checked="" type="checkbox"/> Accountability	<input checked="" type="checkbox"/> Collaboration	
	<input checked="" type="checkbox"/> Customer Service	<input checked="" type="checkbox"/> Equity	
	<input checked="" type="checkbox"/> Innovation	<input checked="" type="checkbox"/> Sustainability	

SUMMARY

This policy, effective January 3, 2023, provides a framework and expectations for establishing, overseeing, moderating, and using social media platforms for organizational use as well as establishing social media public engagement standards, and personal use of social media by employees and others affiliated with the City of Grand Rapids.

PURPOSE

Third-party social media platforms are effective resources for sharing information and outreach with the community. Likewise, public engagement platforms used for civic participation have become valuable resources for obtaining feedback and facilitating a two-way dialogue with residents, stakeholders, and visitors. All such platforms and components are governed by this policy, which is designed to provide standards and procedures for the appropriate use of social media for City business. This policy also covers the use of social media by City employees outside of their job scope and responsibilities, as well as outlining public engagement standards for public comments.

The City's official website, www.grandrapidsmi.gov, will remain the primary means of digital communication. City social media accounts will complement and enhance the City's long-established web presence.

POLICY APPLICABILITY:

The City of Grand Rapids Social Media Policy applies to all employees, elected officials, appointed officials, appointed members of City boards and commissions, interns, temporary employees and assistant positions, both paid and unpaid, and any other group or individual who serves or is

affiliated with the City of Grand Rapids. The social media comment and content moderation subject matter applies to account managers.

ACCOUNT APPROVAL

The City of Grand Rapids Social Media Policy requires that the establishment and use of City social media accounts shall be approved by the Communications Department to ensure consistency with overall communication strategies, branding efforts, and compliance with records retention schedules. City social media accounts shall conform to specific requirements in terms of account administration and content moderation to ensure content meets appropriate legal and professional standards. This policy applies to all City departments, offices, divisions, and staff using social media in an official City capacity.

DEFINITIONS

- **Account manager** is a person who manages or supports a City social media account.
- **Social media platforms** are third-party websites and software applications that allow for the creation of user accounts, content, and interaction around a post, event, group, or other areas of interest. Examples of social media platforms used by the City include Facebook, Twitter, Instagram, LinkedIn, YouTube, and NextDoor. Social media platforms are used as a communications tool to maximize public views for general awareness, public education and engagement, emergency alerts, promotions, and advertising campaigns.
- **City social media administrator** is a person designated by the Director of Communications to oversee organizational social media operations, administration, and policy. This person is responsible for overseeing this policy.
- **City social media account** is an official City of Grand Rapids account on a social media platform approved to conduct City business that is managed in an official capacity by City staff.
- **Records retention schedule** is a document prepared by the City Clerk's Office and identifies the retention period of City records and information retained by each department.
- **City social media content** is any information posted on or shared by a City employee (or authorized representative) on a City social media account. This includes paid, promoted, or boosted content.
- **City social media content moderation** is the practice of monitoring a City social media account for comments, notifications, and direct messages from the public to provide a timely response from City staff and ensure 11active communications.
- **City social media committee** is comprised of employees contributing to City social media accounts and the social media administrator. The committee will have a governing board of at least three members. Consecutive terms will be approved at the discretion of the Communications Director. The purpose of the committee is to serve as a governing board and manage day-to-day employee requests for social media guidance.

ROLES AND RESPONSIBILITIES

1. The City Social Media Administrator is responsible for:

- a. Overseeing the review, approval, creation, development, and management of existing and proposed City social media accounts.
- b. Developing and providing, in collaboration with the Human Resources Department and the City social media committee, enterprise social media training and education.
- c. Ensuring compliance with this policy and its procedures.
- d. Working with the City Clerk's Office to ensure compliance with records retention laws.
- e. Working with the City Attorney's Office to ensure compliance with social media terms of service, community guidelines, and other applicable laws and statutes to include retention of records for Freedom of Information Act purposes.
- f. Having administrative control and access to all City social media accounts.

2. Account Managers are responsible for:

- a. Following this policy and its procedures when managing City social media accounts.
- b. Ensuring all City social media content is retained according to the City's records retention schedules.
- c. Serving as a liaison to the City social media administrator in the Communications Department.

3. The City Attorney's Office is responsible for:

- a. Advising the Communications Department of statutes, regulations and case law requiring modification to the policy or procedures.
- b. Assisting with legal interpretation of the policy language.
- c. Process any Freedom of Information Requests related to social media.

4. Departments are responsible for:

- a. Ensuring account managers and staff adhere to this policy when establishing and managing City social media accounts.
- b. Forwarding requests to the Communications Department to maintain and create City social media accounts.
- c. Managing and monitoring its department's City social media accounts.
- d. Taking appropriate action on violations or complaints related to this policy and its procedures.
- e. Designating social media account managers and ensuring the Communications Department is aware of any changes.

5. City's Social Media Committee is responsible for:

- a. Administering committee functions.

- b. Evaluating and making recommendations related to emerging social media platforms, third party software, and other technologies related to social media and communication operations.
- c. Developing and maintaining City social media training resources and best practices.
- d. Conducting training.
- e. Promoting coordinated messaging.
- f. Updating this policy every three years or as needed.
- g. Reviewing and making recommendations for the creation of new City social media accounts.
- h. Performing audits of and recommendations for existing accounts.

CITY SOCIAL MEDIA PROCEDURES

1. Implementation of City social media accounts:

- a. Authority
 - i. The Communications Department is the coordinating authority for approval, auditing, and governance of City social media accounts.
 - ii. The Communications Director, or their designee, oversees final approval on requests for City social media accounts.
 - iii. All recommendations for new City social media accounts are subject to approval by the Communications Director, or their designee, prior to implementation.
- b. Unapproved Account Creation
 - i. If an account is created without authorization from the Communications Director, it is subject to immediate deactivation until the Social Media Resource Request Form is submitted and approved.
- c. City social media account request process
 - i. All requests for City social media accounts must be submitted using the Social Media Resource Request Form. A request will not be approved if there is no funding identified to pay for records retention or staff designated to manage the account.
 - ii. All requests must be reviewed by the City's social media committee, which will provide a recommendation to the Communications Director before an account can be created. Each department's director, or their designee, must approve the business case prior to submitting a Social Media Resource Request form to the Communications Department. Business case considerations must clearly identify staff responsible for maintenance and include funding to pay for records retention if necessary.

- iii. For all new City social media account requests, prospective account managers must submit a social media action plan (SMAP) to the Communications Department. Each account manager must have a SMAP on record for approved City social media accounts. The SMAP is designed to facilitate discussion to help teams determine audiences, choose a platform, set goals and success metrics, etc. for social media engagement.

d. Creation and Account Management

- i. After approval from the Communications Director, City social media administrator will create the approved account(s) as agreed to by the requesting department.
- ii. All City social media accounts must be created as organizational or business accounts, rather than individual or personal accounts, and must abide by all terms of services of social platforms. Personal email or social media accounts cannot be used to manage City social media accounts unless a social platform requires individuals to have personal social accounts per its terms of service or system requirements.
- iii. The new City social media account(s) must be added to a website listing of all active City social media accounts representing City of Grand Rapids.
- iv. After creating an approved City social media account, the City social media manager will provide administrative permissions to department account managers.
- v. In consultation with the City's Information Technology Department, all social media accounts will be secured in accordance with current security best practices – dependent on the platform – while ensuring the Social Media Coordinator retains full administrative access.

2. Deactivating a City social media account

- a. The Communications Director, upon recommendation from the City's Social media Committee, or the account manager of a City social media account, may authorize deactivating a City social media account.
- b. Considerations for deciding whether to deactivate a City social media account may include, but are not limited to:
 - i. Merging an account into another City social media account.
 - ii. It is no longer needed to accomplish a department's goals.
 - iii. It does not align with the City's mission, vision, or values.
 - iv. It does not comply with these procedures.
 - v. It is not currently being used or is being underutilized with no original posts for at least 60 days.
 - vi. It is not being monitored.

- c. If a decision is made by the Communications Director, or their designee, to deactivate a City social media account, the following actions shall occur:
 - i. Contact the Communications Department to assist in preserving all content before the account is deactivated.
 - ii. Set a timeline for deactivating the account.
 - iii. Develop a farewell message to post on the account that includes when the account will be closed and where followers can go for information in the future.
 - iv. Confirm with the Communications Department that the account has been completely deactivated and no longer a platform for public communication.
 - v. Consult with the Communications Department to determine whether to protect the account name by keeping it active to prevent use of the City's name for improper purposes. If a decision is made to protect the account name, take all necessary action to do so.

3. Social media management platforms

- a. If the account manager of a City social media account would like to use a social media management platform, the account manager must use the current social media management tool contracted with the Communications Department.
- b. The cost of a third-party vendor for social media management may be distributed to departments with City social media accounts.

4. City social media account audits

- a. The Department Director, or their designee, should confirm that City social media content moderation is regularly occurring to ensure that sites are active, that content is engaging, and that content posted in violation of this policy is handled appropriately.
 - i. For purposes of this policy, "active" refers to a page having been posted to at least once weekly; and "engaging" refers to views, reach, and interaction with the posts.
 - ii. Annual audits of account activity and the effectiveness of the content being posted will be performed by the social media committee in collaboration with the account manager.
- b. If necessary, the Communications Director, or their designee, may disable or deactivate a City social media account or prohibit posting City social media content based on prevailing circumstances.

5. City social media content posting

- a. Non-exempt (eligible for overtime) employees who manage City social media accounts shall monitor, create, maintain, or post on the City social media account only during normal office hours, unless pre-approved by the employee's supervisor.
- b. Staff contributing to City social media accounts will follow these guiding principles:
 - i. To the extent possible, the use of social media will link back to the City's website for forms, documents, online services and other information necessary to conduct business with, utilize the services of the City, or learn more about the City.

- ii. Account managers must carefully consider the information they are sharing, as it is widely accessible. All content (both published and deleted/modified) is subject to FOIA requests.
- iii. Follow best practices from the Communications Department on deleting and editing posted content.
- iv. Follow the archive and retention schedule for all social media content, including posts and messages which are considered public record, as outlined in the archives section in this policy.
- v. Ensure content only reflects the official positions of the organization regarding City employees, policies, programs, or practices, and opinions or practices of other public agencies, political organizations, private companies, or non-profit groups.
- vi. Ensure comments do not violate the City's privacy, confidentiality, or legal guidelines for external communication. Never comment on anything related to legal matters, litigation, or any associated parties without the appropriate approvals, and be mindful of "no contact" periods for contract awards or requests for services.
- vii. Prioritize the use of original multimedia and digital content captured or generated by the City. When using another externally generated content, ensure the city has permission to do so and use platform appropriate attribution practices.

6. Public Engagement Expectations

a. Purpose

- i. The purpose of City social media accounts is to enable the City to post matters of public interest concerning City of Grand Rapids programs, activities, news stories and photos, and to enable public engagement. City social media accounts are limited forums devoted exclusively to its posted content, and comments from members of the public should be relevant to the subject matter of the post they are responding to and adhere to established community guidelines.
- ii. The City welcomes engagement and seeks to maintain an environment that is civil and appropriate for all ages.
- iii. By posting on any City social media page, commenters agree to follow community guidelines. The City of Grand Rapids is not responsible for and neither endorses nor opposes comments placed on the site by visitors. Commenters are personally responsible for their own comments, username and any information they post to the page. City social media administrators may remove content that does not follow this policy.

b. Limited Public Forum

- i. The City's social media pages are limited public forums. The City does not make its social media accounts available for general public discourse, but rather reserves and limits the topics that may be discussed on City social media accounts.

c. City's Use of Commentor Content

- i. The City can reproduce, distribute, publish, display, and otherwise use commentor content.

- ii. If a commentor does not wish to have the content they have posted used, published, copied and/or reprinted, they should not post on City social media pages.
- d. Content Restrictions
- i. Because communication via social media constitutes a limited public forum, the City reserves the right to reject or remove (if possible) any content that is deemed in violation of this policy or any applicable law. Content and comments posted to City social media accounts containing any of the following forms of content shall not be permitted and are subject to removal and/or restriction by City social media account managers:
 - 1) Comments or hyperlinks not directly related to the business or work of this department/office or to the particular social media content being commented upon may be deleted.
 - 2) Defamatory, threatening, profane, obscene, violent, bullying, sexual or harassing language or links are not allowed and may be deleted.
 - 3) Content that promotes, fosters, or perpetuates hate or discrimination on the basis of on any legally protected category including, religion or creed, color, national origin, ancestry, sex, age, physical or mental disability, medical condition, sexual orientation, marital status, gender identity, gender expression, genetic characteristics or information, military and veteran's status, or any other category protected by federal or state law, including association with individuals with these protected characteristics or perception that an individual has one or more of these protected characteristics. We may delete any such content.
 - 4) Solicitations of commerce are not allowed. Do not post advertisements, prize contests, promotions to like a page, or giveaways. This includes promotion or endorsement of any financial, commercial or non-governmental agency.
 - 5) Comments in support of or opposition to political campaigns or ballot measures will be deleted.
 - 6) Personally identifiable information, such as an address, phone number, email addresses, social security number or other sensitive information should not be posted and may be removed.
 - 7) Details about an ongoing investigation or legal or administrative proceeding that could prejudice the processes or could interfere with an individual's rights and may interfere with or compromise current investigations, police tactics and the safety or security of public safety staff and/or the public or public systems should not be posted and may be removed.
 - 8) Content that promotes or encourages, or appears to promote or encourage, the use or possession of unlawful or illegal goods, the use of illegal services, or the practice of illegal behaviors or activities should not be posted and may be removed.
 - 9) Distribution of copyrighted photographs, music, video, graphics or other content without the express permission of the copyright holder or that

violates the legal ownership interests of another party is not allowed and may be removed.

10) Content that defames or defrauds anyone or financial, commercial or non-governmental agency should not be posted and may be removed.

11) Documents of any kind like invoices, personnel lists, rosters, etc. should not be posted and may be removed.

12) Comments that violate this policy may be removed from the social media page.

13) Posts or links that contain malicious software (malware) such as viruses, worms, trojans, rootkits, spyware, adware or any other unwanted software should not be posted and may be removed.

14) Multiple or repetitive posts will be considered spam, will be archived, and may be hidden and removed.

e. Content Removal

- i. Content that is deemed not suitable for posting by a City social media account manager, based on the criteria defined above, shall be retained by account managers pursuant to the records retention schedule in the form of a screen capture or archiving solution. The comment will then be removed, as technology allows, from the City social media accounts.

f. Notice of Removal

- i. Users and visitors to any City social media accounts shall be notified that the intended purpose of the account is to serve as a mechanism for communication of City news, services and events and that it is a limited public forum. By posting or commenting, users agree to the terms of use outlined in this policy, which will be posted to the City's website and linked to, as technology allows, from each of the City social media accounts.

g. Time of Use

- i. City social media accounts are not monitored 24/7, and as such, posts and responses should not be immediately expected. Accounts are traditionally monitored during normal business hours, designated as weekdays from 8 a.m. to 5 p.m., excluding holidays.

h. Accessibility

- i. When possible, and as technology allows, City social media account managers will make every effort to ensure that content posted to social media accounts is accessible to all, including those with visual or auditory impairments, by using available alt text, closed captioning or other assistive and accessibility features.

i. Emergency Situations, Issue Reporting, General Questions

- i. City social media accounts are not monitored 24/7, users are advised NOT to use the City's social media accounts to report a crime, emergency situation, or general reports. The Customer Service Department has a team that manages calls and emails to address general concerns.

1) Call 9-1-1 to report crimes and request police, fire or emergency medical assistance.

- 2) Call 3-1-1 (or 616-456-3000) to report general issues or to ask general questions.

7. Account Manager Comment Moderation and Interactive Features

- a. Comments on posts should be regularly monitored to ensure compliance with this policy. While all departments are encouraged to be as engaging as possible, those departments not able to regularly monitor or moderate comments, upon approval by the Director of Communications, may deactivate commenting or other interactive features if the following conditions are met:
 - i. Commenting must be deactivated platform-wide
 - ii. Deactivating comments is due to inadequate staffing or resourcing
 - iii. Instructions on alternative methods of communicating with the City (i.e 311, direct messaging, email, etc.) must be prominently displayed on the profile or within each post.
 - iv. Deactivation should be considered semi-permanent and once turned off will require approval of the Communications Director to reactivate.
- b. Under no circumstance should users be blocked from City social media accounts. If suspicious activity is noted, staff should report it directly to the social media platform.
- c. A City department that creates a City social media account that permits engagement must include a link to a single City webpage that lays out the City's social media public engagement expectations outlined in this policy. Statements on the page will include:
 - i. The reasons listed under the content restrictions in Public Engagement Expectations section.
 - ii. That comments posted by others to City social media accounts do not necessarily reflect the views or position of the City.
 - iii. Notifying people that "follows" from City social media accounts do not reflect endorsements.
 - iv. The City is not responsible for, and neither endorses nor opposes, comments placed on this site by visitors to the site.
- d. City departments and employees contributing to and managing content on City social media accounts must adhere to the following comment moderation criteria:
 - i. Staff can only delete public comments from City social media accounts per the content removal and archiving sections of this policy.
 - ii. Some Social media platforms include features that allow an account manager to hide comments from public view. Hiding comments is only permitted if it meets one of the conditions under the content restrictions in Public Engagement Expectations section.
 - iii. If photos, video, or other media are solicited from the public through a City social media account to increase public interaction, all content received must be accepted and remain public unless it fails to meet the criteria stated above.

PERSONAL OR EMPLOYEE GROUP USAGE OF SOCIAL MEDIA ACCOUNTS

The City of Grand Rapids has a highly engaged community with numerous avenues for online discussion, including social media platforms. These avenues of communication can be very useful and positive avenues for communication with one another and our community. As such, we encourage our employees, volunteers, elected officials and affiliates to engage on social media by sharing City news, digital content, photos, videos and announcements, engaging in positive discussions about news and events and generally acting as good stewards of the City's brand and messaging.

Remember that regardless of whether an employee is speaking personally or professionally, they are viewed first and foremost by others as an employee or representative of the City of Grand Rapids. Others view an employee as a representative and spokesperson of the local government.

Personal use of social media

- a. The City's social media policy applies to employees whenever using social media in a manner related to their job or to City business, including when employees are not at work, not on work time or using their own personal computer or electronic device.
- b. Employees may not use social media for purposes unrelated to their job duties while on work time and in work areas unless authorized to do so by their department head.
- c. Employees must not use their City email address to register an account on social media platforms, blogs or other online tools utilized for personal use.
- d. Before creating online content, employees are encouraged to consider some of the risks and rewards that are involved. When posting content on social media as a private citizen regarding a matter of public concern, keep in mind that conduct that adversely effects the efficiency of the City's public service, impairs workplace discipline or destroys harmony with co-workers may result in disciplinary actions up to and including termination.
- e. Employees must ensure that their postings are consistent with the City's policies that prohibit unlawful discrimination, bullying, and harassment. Inappropriate postings that include discriminatory remarks, harassment, bullying and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject an employee to disciplinary action up to and including termination.
- f. Employees must be respectful. They must always be fair and courteous to fellow employees, constituents, suppliers, residents, people who work on behalf of the City or other community stakeholders. If they decide to post complaints or criticism, do not use statements, photographs, video or audio that reasonably can be viewed as malicious, obscene and threatening or intimidating, that disparage constituents, employees or suppliers or that may constitute harassment or bullying. Examples of such conduct include offensive posts meant to intentionally harm someone's reputation or posts that contribute to a hostile work environment on the basis of race, color, gender, religion, national origin, creed, disability, height, weight, pregnancy, marital status or age.
- g. Employees must not post:
 - i. Information about actual or potential claims or litigation involving the City of Grand Rapids.
 - ii. Information that includes sensitive or confidential information about the City, its staff or its residents that would constitute an invasion of an individual's privacy.

- h. Unless authorized to do so by the City, employees must never represent themselves as a spokesperson for the City. If the City is a subject of the content being created, employees must be clear and open about the fact that they are an employee and make clear that their views do not represent those of the City.
 - i. Regardless of any other provision of this policy, the City's social media policy does not prohibit employees from engaging in this kind of activity, nor prohibits any other activity that is protected by the Public Employment Relations Act.
 - ii. Failure to comply with this social media policy may be grounds for disciplinary action, up to and including discharge. In addition, the City reports all illegal activities to the appropriate law enforcement authorities.

ARCHIVES AND RECORDS RETENTION

The Communications Department may choose to contract with a third-party vendor to assist with archives and records retention on behalf of City departments. All departments using social media must have their content archived under the same City account. The cost of a third-party vendor for archiving City records may be distributed to departments with City social media accounts. If the City's contracted vendor cannot archive messages on a particular platform, content creators should save a screenshot of the communication to be retained on a City system.